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**Modified Phase II Environmental Site Assessment
Eka Chemicals Inc.
2701 Road N NE
Moses Lake, WA 98837**

**November 1, 2007
027-30066-00**

Prepared For
Eka Chemicals Inc.
2701 Road N NE
Moses Lake, WA 98837





ENVIRONMENTAL MANAGEMENT & CONSULTING ENGINEERING

November 1, 2007

027-30066-00

Mr. Lind Bingham
Eka Chemicals Inc.
2701 Road N NE
Moses Lake, WA 93387

Subject: Modified Phase II Environmental Site Assessment
Eka Chemicals Inc.
2701 Road N NE
Moses Lake, WA 98837

Dear Mr. Jordan:

LFR Inc. (LFR) is pleased to submit the attached Modified Phase II Environmental Site Assessment (ESA) report for the above-referenced industrial property located within the City of Moses Lake in Grant County, Washington ("the Site"). The Modified Phase II ESA is part of a continuing due-diligence process to assess the presence of potential COC in soils for specific areas of the facility. The attached report includes a summary of the field methods and observations, the sample laboratory results, a regulatory compliance review of sample data, and the findings and conclusions of the assessment program.

LFR appreciates this opportunity to have provided consulting services on this important project. If you have any questions concerning this project, or would like to discuss other environmental concerns, please call us at (509) 535-7225.

Sincerely,

Antonio J. Chavez, P.E.
Senior Engineer

Nichol N. Pettis, E.I.T.
Senior Staff Engineer

Attachment

cc: Jimmy Jordan, Eka Chemicals Inc.

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1.0 INTRODUCTION

LFR Inc. (LFR) was retained by Eka Chemicals (the Client) to perform a Modified Phase II Environmental Site Assessment (ESA) on the Eka Chemicals facility located in the city of Moses Lake, Grant County, Washington (the Site). This report documents the methods, findings, and conclusions of this Modified Phase II ESA.

1.1 Purpose

The objective of the Modified Phase II ESA was to identify potential contaminants or areas of concern based on a limited records search and information provided by knowledgeable on-site parties, to use the information obtained to perform limited environmental sampling and analysis in specific areas identified, and to prepare a report with LFR's findings. A Phase I Environmental Site Assessment had not been conducted at the site, but areas of shallow contamination were identified by on-site personnel.

The Eka Chemicals Moses Lake facility produces sodium chlorate for use as a bleaching agent in pulp & paper mills. Hydrochloric acid and sodium hydroxide are used and stored at the site. Site operations and discussions with onsite personnel indicated the occurrence of releases and/or spills in areas where chemicals are stored, mixed, and loaded or unloaded. LFR therefore focused the investigation in these areas.

Based upon discussions with the Client, previous investigations, and discussion with onsite personnel, the following specific areas were identified for the ESA:

- Railcar Loading/Unloading Area
- 1997 Spill Location
- 2007 Spill Location

1.2 Scope of Work

The Scope of Work for the Modified Phase II ESA included a site reconnaissance, interviews with onsite personnel, and a limited environmental database search, and a subsequent soil sampling program.

The Phase II ESA included subcontractor coordination, a soil sampling field investigation program, subcontractor laboratory services, data interpretation, and preparing a report documenting the findings and conclusions of the assessment process.

2.0 SITE DESCRIPTION

2.1 Site Location and Description

The Site is located in the Northwest Quarter of Section 21, of Township 19 North, Range 29 East in Grant County at 2701 Road N NE, Moses Lake, Washington and is described by the City of Moses Lake as Tax Lot No. 5000 of Farm Unit 233, Irrigation Block 41 (Figure 1). Land use in the vicinity of the site consists of mixed agricultural, commercial, and industrial. The site is bordered to the north by McKay Seed Company, and further north by Washington Central railroad tracks and Wheeler Road. Agricultural land borders the Site to the east and south and Road N borders the Site to the west.

Based on a review of the United States Geological Survey (USGS) Sieler, Washington 7.5-minute quadrangle map (USGS 1956), and Wheeler, Washington 7.5-minute quadrangle map (USGS 1956), the site is approximately 1221 feet above mean sea level (msl). The topography at the Site is relatively flat, but slopes generally to the southwest. Moses Lake is the closest water body to the Site and is located approximately four miles to the west.

2.2 Geology

The Site is located within the Quincy Basin, a structural sub-province of the Columbia Plateau. The Columbia Plateau consists of a series of flood basalts, Miocene in age, that form an extensive volcanic plateau covering most of central and eastern Washington (Camp 1982). Pleistocene-age glacial flood deposits overlie the Columbia River Flood Basalts. Glacial flood deposits consist of fluvial gravel ranging from boulder sized gravel to fine sand, rounded basalt fragments and locally contains granitic and metamorphic rocks (Geologic Map of Ritzville 1:100,000 Quadrangle, Washington, OFR 90-2). These materials were deposited by high-energy waters of glacial outburst floods.

2.3 Soils

According to the Soil Survey of Grant County, Washington, prepared by the USDA Soil Conservation Service, the soils within the Site vicinity comprise the Scoon silt loam and Warden silt loam with zero to seven percent slopes. These soils are classified as well drained with intermediate holding capacity. The Scoon silt loam is formed from loess and typically comprises terraces and alluvial fans. The Warden silt loam is found in terraces and formed from parent material consisting of loess over lacustrine deposits. The surface layer of both soils is approximately 6 inches thick and consists of silts and clays. Cemented material, or hardpan exists within the profile of the Scoon silt loam from approximately 16 inches to 20 inches.

2.4 Hydrogeology

Ground water in the site vicinity is contained within densely layered basalt rocks and is part of a large system which covers a majority of east-central Washington. According to WDOE files, approximately 16 private and eight public water supply wells are located within a 1-mile radius of the Site. Static water levels reported in these wells range from approximately 25 feet to 280 feet below ground surface (bgs). The closest well for which there is data is located 1/8 – 1/4 mile to the south southwest of the Site, with static water levels ranging from 260 to 340 feet bgs. Regional ground water flow is reported as south to southwest toward the Snake and Columbia Rivers (Luzier et al, 1968).

3.0 PRIOR INVESTIGATIONS

Soiltest Farm Consultants, Inc. of Moses Lake, WA performed a Chlorate Spill Soil Survey as documented in a report dated May 11, 2007. The survey was performed to a maximum depth of three ft bgs in the vicinity and aftermath of the 2007 sodium chlorate spill. Soiltest Farm Consultants, Inc. found the presence of sodium, chloride, and chlorate at elevated concentrations in all soils tested, and concluded that the elevated concentrations and high solubility of the sodium and chloride salts were cause for concern regarding groundwater contamination. Soiltest Farm Consultants, Inc. recommended that deep core soil samples be obtained to establish the depth and rate of movement of the salts relative to groundwater elevations.

4.0 ENVIRONMENTAL RECORDS

4.1 Environmental Database

An environmental database report prepared by EDR was reviewed for local, state, and federal listings for properties within the Site area. Included in EDR's report are regulatory database lists, which were reviewed by EDR for cases pertaining to leaking USTs and ASTs, hazardous waste sites, and abandoned sites within ASTM-specified radii (Table A). EDR also reviewed selected database lists generated by the United States Environmental Protection Agency (U.S. EPA).

Explanations of the regulatory agency database lists reviewed and acronyms used by EDR are presented in EDR's report in Appendix A.

Table A: Regulatory Agency Databases/Lists Reviewed (Non-inclusive list)

Search Radius	Agency	Database	Type of Records in Database
1.0 mile	U.S. EPA	NPL	Sites designated for Superfund cleanup by the U.S. EPA

Search Radius	Agency	Database	Type of Records in Database
	U.S. EPA	CORRACTS	Resource Conservation and Recovery Act facilities undergoing "corrective actions"
	WA DOE	CSCSL	Confirmed or suspected contaminated sites
	DOD	USGS	Department of Defense Sites
0.5 mile	U.S. EPA	CERCLIS - NFRAP	CERCLIS sites with no further remedial actions planned at time of report
	WA DOE	LUST	Sites on state index of leaking underground storage tanks
	WA DOE	INST CONTROL	Sites with institutional controls restricting use
	WA DOE	BROWNFIELDS	Sites on the state inventory of brownfield sites
	U.S. EPA	INST & ENG	Sites with institutional and engineering controls
	U.S. EPA	BROWNFIELDS	Sites identified as brownfield sites
	U.S. EPA	RCRA TSD	Facilities that treat, store, and/or dispose of hazardous waste
	U.S. EPA	CERCLIS	Sites under review by the U.S. EPA
	U.S. EPA	RCRA Generator	Sites that generate large or small quantities of hazardous waste
0.25	U.S. EPA	DRYCLEANERS	Drycleaner facilities
	U.S. EPA	RCRA Generator	Sites that generate large or small quantities of hazardous waste
Target Property	WA DOE	SPILLS	Listing of hazardous materials, spills, releases, or accidents as reported to Idaho's Central Communications Center

Notes:

WA DOE=Washington Dept. of Ecology
 FINDS=Facility Inventory Database System
 INST CONTROL=Institutional Controls
 NPL=National Priority List

RCRA=Resource Conservation and Recovery Act
 INST&ENG=Institutional or Engineering Controls
 LUST=Leaking Underground Storage Tank
 CSCSL=Confirmed & Suspected Contaminated Sites

CERCLIS = Comprehensive Environmental Response, Compensation and Liability Information System

4.1.1 Site

According to the records search, the Site appears on the following researched environmental databases: RCRA Large Quantity Generator, FINDS. The Site generates D001 (ignitability) and D007 (chromium) listed waste. Multiple violations exist for the time period between 1992 and 2000, generally involving labeling and storage practices. There are no federal NPL, CORRACTS, RCRA TSD, CERCLIS, TRIS, or ERNS sites within the Site. Likewise, there are no State of Washington listed sites for SPILLS or LUST within the Site. The complete report from EDR has been included in Appendix A.

4.1.2 Off-Site Properties

EDR identified one CSCSL-No Further Action site within 1/2 mile of the northeastern property line of the site at the Nestle Brands – Moses Lake facility (now J.R. Simplot Company). The site received the No Further Action edict on December 24, 1996. Although the Nestle Brands – Moses Lake facility is in close proximity to the subject site, it is not considered a significant hazard to the subject Site due to the apparent containment of contamination and closure of remedial activity at the facility.

Potential environmental hazards posed by surrounding sites are not considered significant due to the elevation or upgradient position of the Site, or the apparent containment of any reported contamination in close proximity to the subject Site.

4.2 Historical

LFR obtained historical information on the site and site vicinity during this Modified Phase II ESA. The historical sources include topographic maps. A summary is provided in Table B.

Table B: Historical Information Reviewed/Agency Records Summary

Source	Date	Information Obtained
Topographic Maps	Site: 1956, 1978 (partial)	<p>Site. The Site appears undeveloped in both the 1956 and the 1978 topographic maps. The Site area appears to be located approximately 1221 feet above msl.</p> <p>Off Site. A sugar beet refinery is visible across Road N NE to the west of the Site. Railroad tracks connecting the sugar beet refinery to the Northern Pacific railroad tracks located northeast of the site are also visible.</p>
Sanborn® Fire Insurance Maps	EDR Report Dated 08/09/07	According to EDR, Sanborn® Fire Insurance Maps are not available for the Site vicinity.

5.0 SUBSURFACE ASSESSMENT

The Modified Phase II ESA soil sampling program was conducted on September 11, 2007. The monitoring, sampling, and documentation for the sampling program was conducted by LFR personnel. The following sections describe the procedures conducted and observations made during field activities and present the analytical results for the collected soil samples.

5.1 Soil Sampling Activities

The limited soil sampling program included obtaining soil samples from locations down to 12 ft bgs, collected via a Geoprobe rig owned and operated by Environmental West Exploration, Inc. LFR provided monitoring and documentation for the Geoprobe operation. Daily Field Report and Daily Tailgate Safety forms were completed during sampling activities and are maintained by LFR within the project records. Photographs were taken by LFR personnel and are provided in Appendix A.

Soil samples were placed into laboratory-provided polyethylene containers and glass jars with Teflon-lined lids. Sample containers were labeled, placed in an iced cooler and transported under chain-of-custody protocol to American Analytical Services of Osburn, ID for inorganic analyses, and to Test America of Spokane, Washington for organic analyses. LFR sampling equipment was decontaminated between sample points using Alconox and isopropanol.

Up to three soil samples were collected from each discrete location in the vicinity of the railcar loading/unloading area, the 1997 spill location, and the 2007 spill location, as follows:

- Samples B-1-1, B-1-2, and B-1-3 were collected from the southern portion of the 2007 spill impact graveled area, to delineate the affected area;
- Samples B-2-1, B-2-2, and B-2-3 were collected from the northern portion in the 2007 spill impact area;
- Samples B-3-1, B-3-2, and B-3-3 were collected from the asphalted downslope area near the 2007 spill location;
- Samples B-5-1, B-5-2, and B-5-3 were collected from below the ballast between the railroad tracks on the southern side of the sodium chlorate loading/unloading area, which was the site of the 2007 spill;
- Samples B-6-1 and B-6-2 were collected from below the ballast between the railroad tracks the northern side of the loading/unloading area, an area suspected of impact from the 1997 spill;
- Samples B-7-1, B-7-2, B-7-3 were collected in the graveled area of the 1997 spill impact area;
- Samples B-8-1, B-8-2, and B-8-3 were collected from the graveled area in the vicinity of the acid loading/unloading area;
- Sample B-9-1 was collected in the field east of the water cooling towers to check for potential herbicide contamination and to provide a background sample for the inorganic analyses.

Soil boring locations are also shown on Figure 3. The concrete slabs between the railroad tracks were temporarily removed to provide access for the B-5 and B-6 soil borings. Sample intervals were adjusted as necessary to account for actual soil recovery from the soil borings, soil boring refusals, and to avoid sampling railway ballast or surface gravel. The first tier of samples was the shallowest, obtained from

one to four feet bgs. The second tier of samples ranged from five to seven feet bgs. The third tier of samples was the deepest, ranging from 8.5 to 12 feet bgs. Groundwater was not encountered during site investigation activities.

The soil sample matrix is provided in Section 5.2 and the soil sample locations are presented in Figure 2. Analytical results for the soil samples collected from the nine soil samples are discussed in Section 7.0 and are shown on Table 1.

5.2 Soil Sample Matrix

The samples were analyzed using U.S. EPA protocols, with the exception of sodium chlorate, which does not have a governmental standard for analysis. The method used by American Analytical Services for sodium chlorate analysis is outlined in Appendix C. All samples were collected on September 11, 2007. The following table presents a summary of the sample matrix.

SOIL SAMPLE MATRIX

SAMPLE ID	ANALYSES
B-1-1	A, B,D,F
B-1-2	A
B-1-3	A
B-2-1	A,D,F
B-2-2	A
B-2-3	A
B-3-1	A,D,F
B-3-2	A
B-3-3	A
B-5-1	A,D,F
B-5-2	A,D
B-5-3	A
B-6-1	A,D,E,F
B-6-2	A
B-7-1	A,D,F

SAMPLE ID	ANALYSES
B-7-2	A, B
B-7-3	A
B-8-1	A,D,F
B-8-2	A,D
B-8-3	A
B-9-1	A,C,D,F

Key:

- A) Sodium Chlorate by American Analytical Services Method (Appendix C)
- B) Hydrocarbon Identification by NWTPH-HCID
- C) Chlorinated Herbicides by EPA Method 8151A
- D) Total Chromium by EPA Method 200.7
- E) Hexavalent Chromium by 3500CrB
- F) Lead by EPA Method 200.7

6.0 REGULATORY CLEANUP STANDARDS

A necessary element of the Modified Phase II ESA effort is the selection of appropriate cleanup standards for the potential contaminants of concern (COC) identified above in Section 5.2.

As provided in MTCA (section 700), appropriate cleanup standards are to be identified for particular substances at a site and the specific areas or pathways, such as land or water, where humans and the environment can become exposed to these substances. In addition, these standards were established by WDOE to protect human health and the environment for current and potential site and resource use. The modified Phase II ESA was designed to provide specific analytical data and site information for assessment with soil cleanup criteria.

The MTCA stipulates that soil cleanup levels shall be based on estimates of reasonable maximum exposure. The cleanup actions must achieve cleanup levels defined by MTCA and also comply with other applicable state and federal laws. Two types of land use, unrestricted and industrial are recognized by the MTCA for soil cleanup levels. The soil cleanup levels for unrestricted land use are based on reasonable maximum exposure for children in residential conditions. The soil cleanup standards for industrial land use are based on reasonable maximum exposure expected to occur under industrial worker exposure scenarios. Specific criteria are established for determining whether a site qualifies as an industrial property [see WAC 173-340-745(1)].

The site soil sample analytical data was reviewed and assessed to determine if the COC, as applicable, exceed the MTCA cleanup standards: Method A Soil Cleanup Levels for Unrestricted Land Uses [from Table 740-1, WAC 173-340-740 (2)].

Method A cleanup levels were used in this report for assessment of potential petroleum hydrocarbons, total chromium, and hexavalent chromium. No MTCA standard has been established for sodium chlorate in soil.

This report did not assess other human exposure scenarios (e.g., dermal absorption or inhalation of vapors) or terrestrial ecology concerns.

7.0 ANALYTICAL RESULTS

Organic analyses (TPH-HCID and chlorinated herbicides) were performed by Anatek Laboratories of Spokane, WA. Inorganic analyses (Lead, chromium, and sodium chlorate) were performed by American Analytical Services of Osburn, ID. Results of the soil sample analyses are summarized in Table 1.

The laboratory reports are presented in Appendix B. These data indicate the following:

Petroleum Hydrocarbons (NWTPH-HCID):

Samples were collected from two locations for analysis of petroleum hydrocarbons as a general screening effort for sites utilizing rail and motorized transport. Gasoline range organics (GRO), diesel range organics (DRO), and heavy oil range organics (HRO) were not detected in samples B-1-1 and B-7-2 at concentrations above the laboratory method reporting limit.

Chlorinated Herbicides (EPA Method 8151A):

A sample was collected for analysis of chlorinated herbicides to determine if historical agricultural uses had resulted in contamination by common crop management chemicals. Sample B-9-1 was analyzed for twelve types of chlorinated herbicides, including (2-methyl-4-chlorophenoxy)acetic acid (MCPA) and pentachlorophenol. No detection of the herbicides was found above the laboratory method reporting limit.

Sample B-9-1 was collected in the undeveloped field located to the east of the water cooling towers.

Total and Hexavalent Chromium (EPA Method 200.7 and 3500 CrB):

Chromium was analyzed based on research of the Site's waste generation characteristics, review of the EPA document "Sodium Chlorate Listing Background Document for the Inorganic Chemical Listing Determination," and input from the Client. Total chromium was detected below the MTCA Method A, Unrestricted Land Use cleanup level of 2,000 mg/kg in all ten analyzed samples. Total chromium concentrations ranged from 13.3 mg/kg in B-8-1 to 31.8 mg/kg in B-6-1. B-6-1 was also analyzed for hexavalent chromium, which has a MTCA cleanup standard of 19

mg/kg. The reported concentration of hexavalent chromium for B-6-1 was 5.74, well below the MTCA standard.

The shallowest samples from each boring were collected for analysis of total chromium. Two samples were also collected from the mid-level samples, in B-5-2 and B-8-2. Hexavalent chromium was analyzed in B-6-1 as it contained the highest concentrations of total chromium.

Lead (EPA Method 200.7):

Lead was analyzed based on review of the EPA document "Sodium Chlorate Listing Background Document for the Inorganic Chemical Listing Determination," which identified the Site as potentially generating lead waste. Lead was detected below the MTCA Method A, Unrestricted Land Use cleanup level of 250 mg/kg in all eight analyzed samples. Lead concentrations ranged from 6.65 mg/kg in B-2-1 to 12.1 mg/kg in B-3-1.

The shallowest samples from each boring were collected for analysis of lead, for a total of eight samples.

Sodium Chlorate (see Appendix C) :

Sodium chlorate was analyzed in all collected samples. Concentrations in the collected samples ranged from 77.1 mg/kg in B-5-1, to 11,800 mg/kg in B-6-1. The soil sample collected for herbicide analysis from the undeveloped field east of the water cooling towers, B-9-1, was also analyzed for sodium chlorate as a background sample. Concentration of sodium chlorate in B-9-1 was 113 mg/kg.

Section 5.1 describes the location of each boring. Analytical reports are included in Appendix B, and the sodium chlorate analytical method is included in Appendix C. Analytical results are summarized in Table 1.

8.0 FINDINGS

The Modified Phase II ESA was conducted at the Site to assess the presence or absence of potential COCs which included: sodium chlorate, chromium, lead, TPH, and chlorinated herbicides. These potential COCs were identified based on current or historical site usage. A total of 21 soil samples were collected from discrete locations, as identified in section 5.0.

Samples were collected on September 11, 2007; organic compounds were analyzed by Anatek Laboratories of Spokane, Washington and inorganic compounds were analyzed by American Analytical Services of Osburn, Idaho. Analytical results indicated that the COCs were either not detected above the respective laboratory method reporting limits and/or were below MTCA Method A Soil Cleanup Levels for Unrestricted Land Uses.

The shallow soil samples analyzed for petroleum hydrocarbons were obtained in graveled areas adjacent to railcar loading/unloading, at locations where a petroleum spill may have passed through surface material to underlying soils. The lack of detection of petroleum hydrocarbons suggests that petroleum spills or leaks are well-controlled by work practices, and that surfaces at the site are providing a barrier sufficient to prevent incidental petroleum hydrocarbon contamination in soils at the examined areas at the Site.

Chromium was detected at low levels in all soil samples analyzed, well below the MTCA Method A Unrestricted Land Use cleanup level of 2,000 mg/kg. The sample with the highest concentration of total chromium was also analyzed for hexavalent chromium, the result of which was also below the applicable MTCA Method A level. Shallow soil samples are anticipated to have the highest potential concentrations of chromium due to surface spills and leaks; any potential elevated chromium concentrations would be anticipated to attenuate with depth to background levels. The two mid-depth soil samples (at approximately six feet bgs) indicated chromium concentrations equivalent to the background sample obtained from B-9-1.

Lead was detected at low levels in all soil samples analyzed. Shallow soil samples are anticipated to have the highest potential concentrations of lead due to surface spills and leaks; any potential elevated lead concentrations would be anticipated to attenuate with depth to background levels.

Sodium chlorate was detected in all samples analyzed, to depths of up to 12 feet below ground surface. Evaluation of the samples collected from individual borings generally shows a downward trend in concentration with depth, with the exception of boring B-2, which may be a reflection of its downgradient position from the original spill elevation. Two of the borings, B-3 and B-7, approached background concentrations at their deepest sampled interval. The remaining five borings reflected concentrations well above background at their respective deepest intervals, which ranged from six to twelve feet bgs.

The highest concentrations of sodium chlorate were detected between the rails on either side of the sodium chlorate loading facility, in borings B-5 and B-6, reflecting the past two spill events. The persisting concentrations are likely a reflection of the protective nature of their environment, beneath the concrete tie covers between the track rails. All areas directly associated with sodium chlorate handling are capped with concrete and asphalt, which will limit potential movement of sodium chlorate due to meteorological water.

No MTCA soil cleanup level has been established for sodium chlorate.

9.0 CONCLUSIONS

A Modified Phase II ESA was conducted for the Eka Chemicals facility located in the city of Moses Lake, Grant County, Washington, in general conformance with the ASTM standard: *Guide for Environmental Site Assessments: Phase II Environmental Site Assessment Process* (ASTM E-1903-97), professional standards, and regulatory guidance. The Modified Phase II ESA was conducted at the Site to assess the presence of potential COC in soils as a result of historical and current Site usage.

LFR performed a database review and collected samples in areas based on historic and current site usage. The soil sample analytical results indicated that identified COCs with established MTCA Method A cleanup levels were either not detected above laboratory method reporting limits and/or were below applicable MTCA Method A cleanup levels for Unrestricted Land Uses. LFR therefore considers potential impact to soil and groundwater from chromium, lead, or petroleum hydrocarbon contamination due to spills near the railcar loading/unloading area to be minimal.

The lack of detection of the common chlorinated herbicides analyzed in the soil sample collected from the on-site undeveloped field indicates that potential impact to soils and groundwater from historical agricultural management is minimal.

No MTCA soil cleanup level has been established for sodium chlorate. The results of the field investigation indicate that sodium chlorate concentrations at the lowest sampling intervals were typically up to 50% less than the highest concentrations measured in their respective borings. In terms of potential impact to human health, LFR considers the protective barriers provided by the gravel, asphalt, and concrete surfaces to minimize or eliminate direct contact concerns to Eka workers conducting routine duties. These same barriers and the subsurface nature of the impacted soil also mitigate pathway concerns to other environmental and terrestrial receptors. Groundwater was not encountered during the field investigation. The depth to groundwater at the site is anticipated to be several hundred feet below ground surface, thereby reducing risk of potential groundwater impact due to sodium chlorate soil concentrations.

10.0 LIMITATIONS

These findings and conclusions are based on the best available information known or made available, obvious, visual inspection and observations of the Site at the time of the investigation, analytical data provided by an independent laboratory, contacts and discussions with site personnel, owners and operators, regulatory agencies, and others, and opinions and judgments of LFR.

Over time the surficial and recorded evidence of some activities may be obscured, obliterated, or unavailable. It is possible that certain adverse conditions could exist at the Site which were not detected in this evaluation. This limited assessment is, by its purpose and design, not thorough enough to ensure that "absolutely" no hazardous substance contamination, regulatory non-compliance issues, or environmental liabilities and risks are present on a particular property.

The Modified Phase II ESA was not designed to identify the nature and extent of any contaminant affected soil at the Site. This Phase II LSA is, through technical limitations and design, variability in the natural environment, and work scope and budget, not thorough enough to ensure that "absolutely" all contamination has been identified in the investigated area(s), or in other areas related to this or adjacent properties. There are inherent physical/logistical restrictions inherent in limited soil sampling programs. No environmental assessment can wholly eliminate uncertainty regarding the potential for recognized environmental conditions in connection with a property.

The Scope of Work was derived by balancing the need for identifying contaminated areas within specific budgetary constraints. Every effort was made to establish a balance between the competing goals of limiting the costs and time demands inherent in performing this Modified Phase II ESA and the reduction of uncertainty about unknown conditions resulting from additional information.

Samples collected during the limited soil sampling program will only indicate the presence or absence of the investigated contaminant within the discrete sampled unit. Although samples will be collected from areas most likely to be contaminated by suspected substances based on known conditions, contamination may exist in areas not sampled, or for potential contaminants not selected for analysis and characterization. Consequently, any analytical results should be considered only as indicators of possible site conditions, with specific statistical significance. Further, natural background concentrations of certain chemicals may in fact exceed regulatory cleanup levels.

The data presented in this report was collected, analyzed, and interpreted following the standards of care, skill, and diligence ordinarily provided by a professional in the performance of similar services as of the time the services were performed. This report sets forth LFR's findings and conclusions based on the Scope of Work agreed to by the Client, and within the Client's schedule and budget. It is understood that LFR has

assumed responsibility only for performing this Modified Phase II ESA and presenting this report and conclusions to the Client.

11.0 REFERENCES

ASTM Standard: E-1903-97 *Guide for Environmental Site Assessments: Phase II Environmental Site Assessment Process*.

Soiltest Farm Consultants, Inc. 2007. Chlorate Spill Soil Survey. May 11.

United States Geological Survey (USGS). 1978. Sieler, Washington Quadrangle. 7.5-Minute Series Topographic Map.

United States Geological Survey (USGS). 1956. Wheeler, Washington Quadrangle. 7.5-Minute Series Topographic Map.

Washington Department of Ecology (WDOE) *Model Toxics Control Act* (MTCA), Chapter 173-340 Washington Administrative Code (WAC).

TABLE

Table 1: Soil Analytical Results
Eka Chemicals, Moses Lake Facility
2701 Road N NE
Moses Lake, WA
LFR Project 027-30066-00

Sample ID	Depth (ft bgs)	Approximate Location	NaClO ₃ (mg/kg)	Chromium(VI) (mg/kg)	Total Chromium (mg/kg)	Lead (mg/kg)	HCID Diesel (mg/kg)	HCID Gasoline (mg/kg)	HCID Lube Oil (mg/kg)	Herbicides (mg/kg)
B-1-1	1 - 1.5	2007 spill, south gravel	2,510	--	21.4	11	<50	<25	<100	--
B-1-2	6 - 7		974	--	--	--	--	--	--	--
B-1-3	9 - 10		1,524	--	--	--	--	--	--	--
B-2-1	1 - 2	2007 spill, north gravel	2,970	--	22.4	6.65	--	--	--	--
B-2-2	5.5 - 6.5		489	--	--	--	--	--	--	--
B-2-3	8.5 - 9.5		4,288	--	--	--	--	--	--	--
B-3-1	2 - 3	Asphalt downslope	4,570	--	15.7	12.1	--	--	--	--
B-3-2	5 - 6		534	--	--	--	--	--	--	--
B-3-3	10 - 11		144	--	--	--	--	--	--	--
B-5-1	2.5 - 3.5	RR tracks, south	77.1	--	23.4	8.34	--	--	--	--
B-5-2	5 - 6		8,055	--	14.8	--	--	--	--	--
B-5-3	11 - 12		4,180	--	--	--	--	--	--	--
B-6-1	2.5 - 3.5	RR tracks, north	11,800	5.74	31.8	9.11	--	--	--	--
B-6-2	5 - 6		7,047	--	--	--	--	--	--	--
B-7-1	2 - 3	1997 spill, gravel	606	--	16.7	10.3	--	--	--	--
B-7-2	5 - 6		1,566	--	--	--	<50	<25	<100	--
B-7-3	10 - 11		390	--	--	--	--	--	--	--
B-8-1	3 - 4	Acid loading area, grave	128	--	13.3	7.7	--	--	--	--
B-8-2	6 - 7		2,304	--	12.9	--	--	--	--	--
B-8-3	9.5 - 11		1,761	--	--	--	--	--	--	--
B-9-1	2 - 4	Field east of plant	113	--	14.4	8.82	--	--	--	<0.01 ⁽²⁾
MTCA Method A, Unrestricted Land Use (mg/kg)			--	19	19 / 2,000 ⁽¹⁾	250	2,000	100	2,000	--

Notes:

Sodium chlorate analysis performed by American Analytical Services via the method outlined in Appendix C
 Analysis of samples performed in accordance with the scope of work outlined in LFR's proposal dated August 2, 2007.

MTCA = Model Toxics Control Act

ft bgs = feet below ground surface

-- = Not analyzed

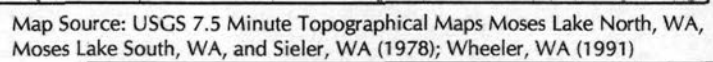
⁽¹⁾ = MTCA Method A values, Chromium (III): 2000 mg/kg, Chromium (VI): 19 mg/kg

⁽²⁾ = No detection of any analyzed herbicide above the PQL of 0.01 mg/kg.

Prepared By: NNP
 Checked By: AJC

Date: 09/25/2007
 Date: 10/31/2007

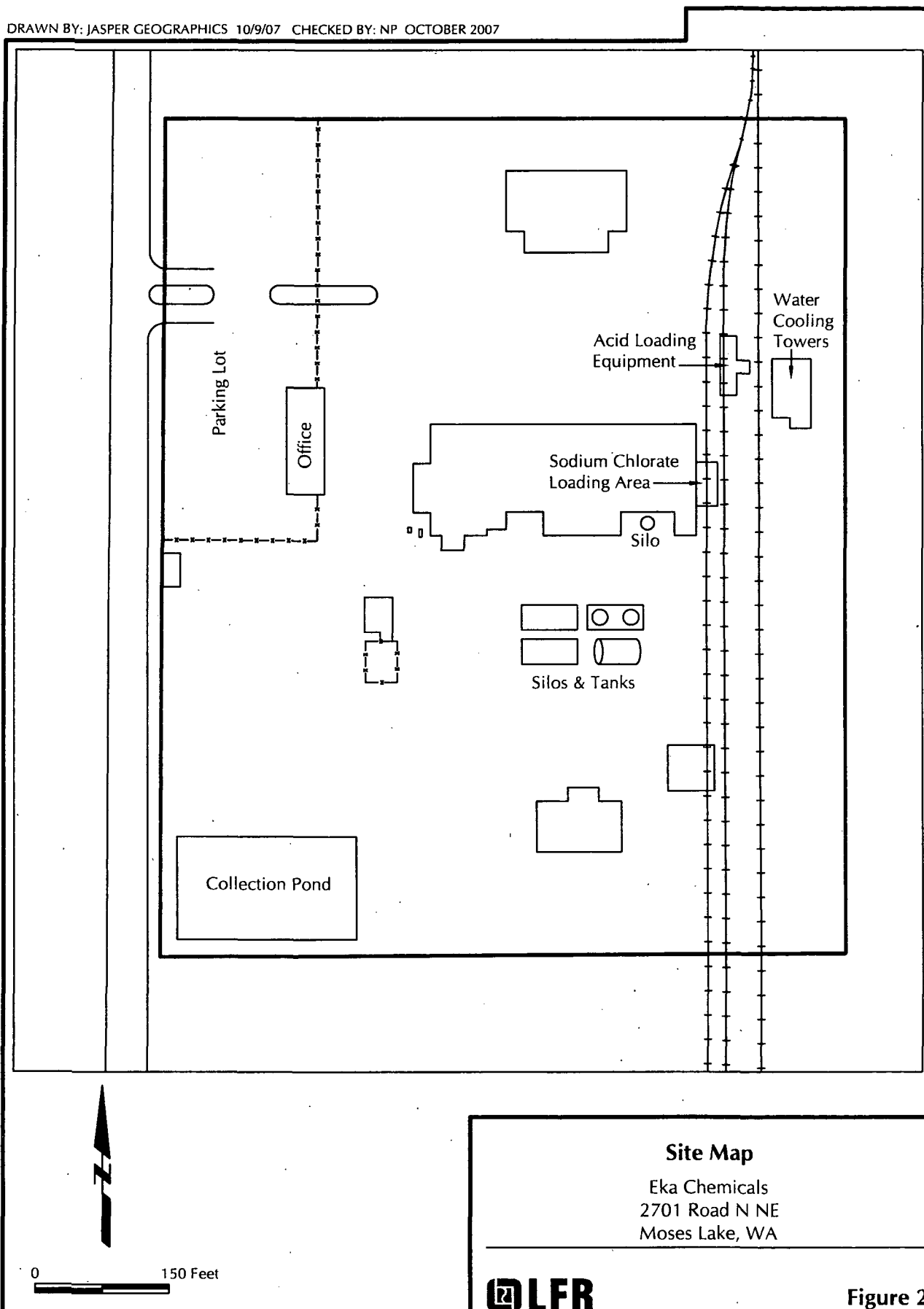
FIGURES



Eka Chemicals
2701 Road N NE
Moses Lake, WA



Figure 1

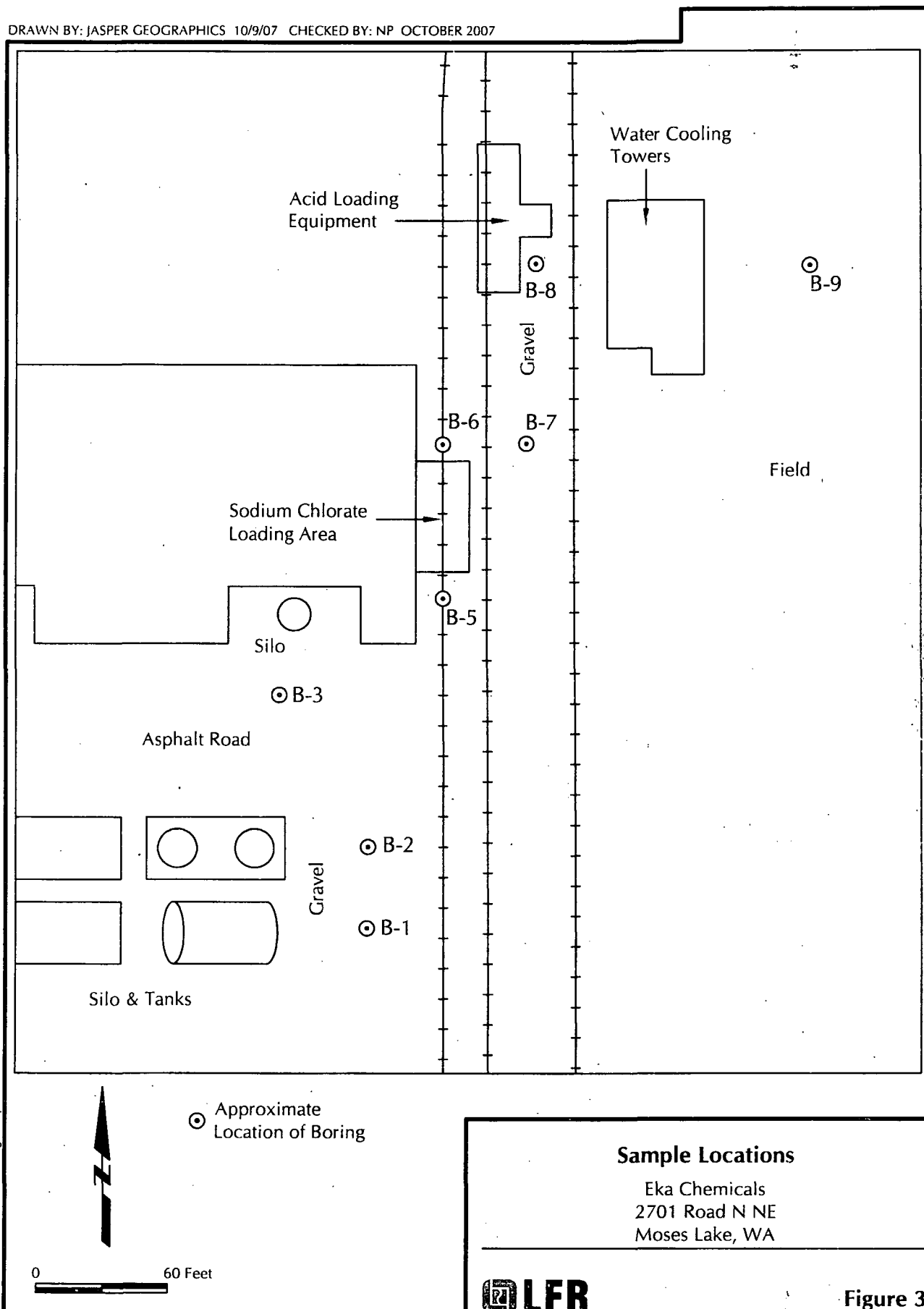


Site Map

Eka Chemicals
2701 Road N NE
Moses Lake, WA



Figure 2



APPENDIX A

Site Photographs

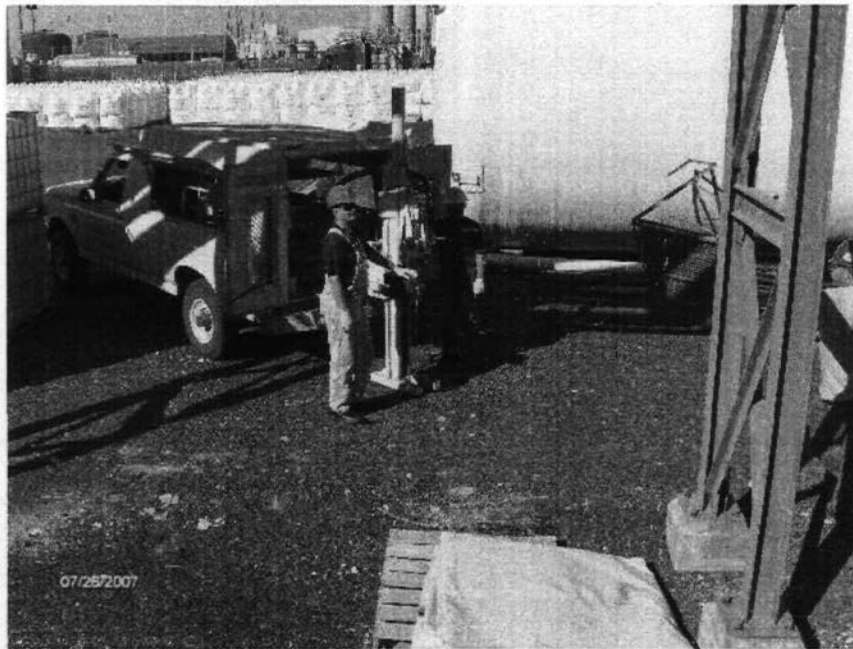


Photo 1: Photograph of boring location B-1, with Geoprobe rig and Environmental West personnel visible (photograph taken from the east).

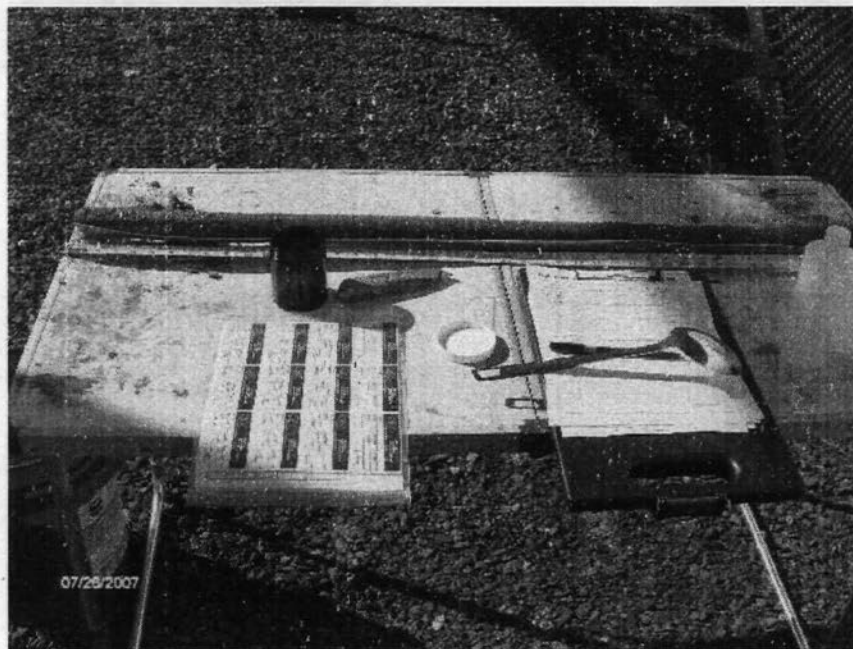


Photo 2: Photograph of sampling table, boring B-1 (photograph taken from the north).



Photo 3: Photograph of caliche layer, boring B-1.

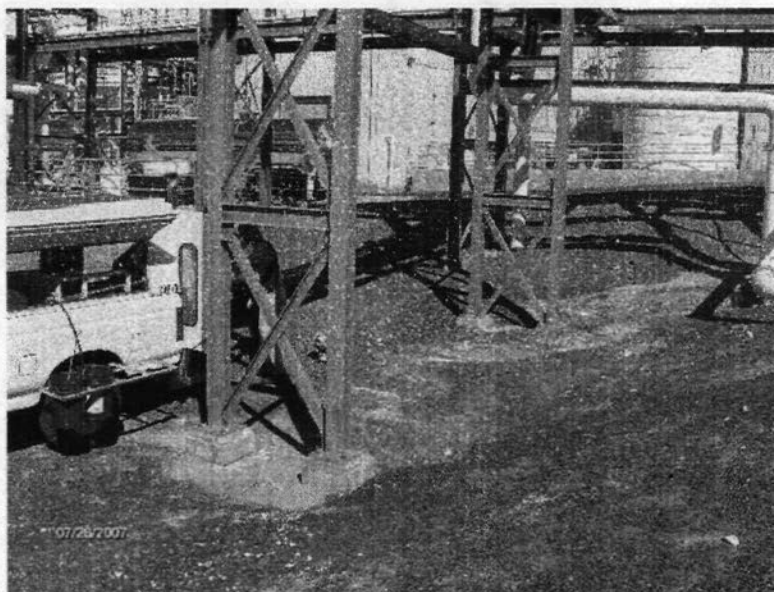


Photo 4: Photograph of boring location B-2 (photograph taken from the southeast).



Photo 5: Photograph of boring location B-5 and sampling table (photograph taken from the southwest).



Photo 6: Photograph showing removal of rail ballast at boring B-5 (photograph taken from the west).



Photo 7: Photograph showing location of boring B-3 during setup (photograph taken from the west).



Photo 8: Photograph showing location of boring B-6 during setup (photograph taken from the north).



Photo 9: Photograph showing location of boring B-7; indicated by white "x" in gravel (photograph taken from the east).

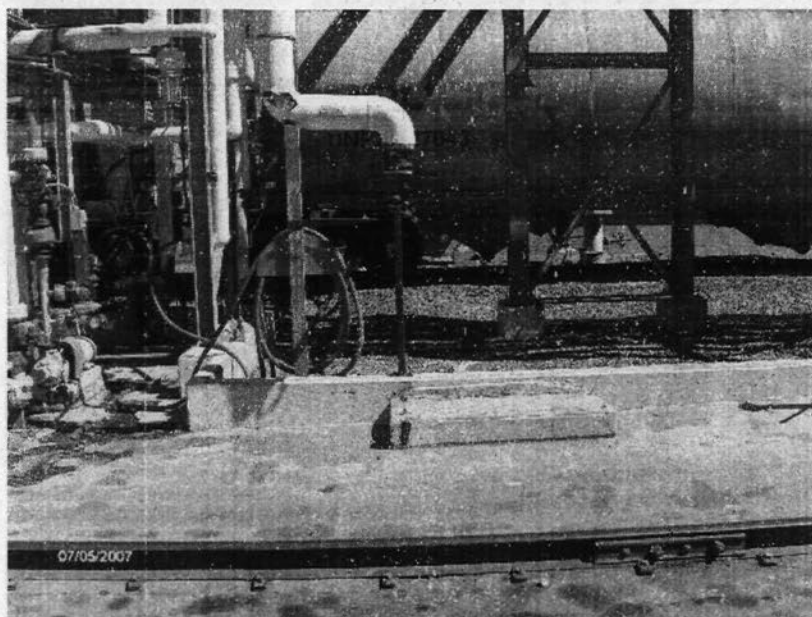


Photo 10: Photograph of acid loading/unloading area, location of boring B-8 in gravel (photograph taken from the west)

APPENDIX B

Laboratory Reports

Anatek Labs, Inc.

1282 Alturas Drive • Moscow, ID 83843 • (208) 883-2839 • Fax (208) 882-9246 • email moscow@anateklabs.com
504 E Sprague Ste. D • Spokane WA 99202 • (509) 838-3999 • Fax (509) 838-4433 • email spokane@anateklabs.com

Client: LFR INC
Address: 2310 N. MOLTER RD. #101
LIBERTY LAKE, WA 99019
Attn: NICHOL PETTIS

Batch #: 070912049
Project Name: EKG - 027-30066-00

Analytical Results Report

Sample Number	070912049-001	Sampling Date	9/11/2007	Date/Time Received	9/12/2007 3:15 AM
Client Sample ID	B-1-1	Sampling Time		Extraction Date	9/14/07
Matrix:	Soil	Sample Location			

Parameter	Result	Units	PQL	Analysis Date	Analyst	Method	Qualifier
HCID Diesel	ND	mg/Kg	50	9/14/2007	CAS	WATPH-HCID	
HCID Gasoline	ND	mg/Kg	25	9/14/2007	CAS	WATPH-HCID	
HCID Lube Oil	ND	mg/Kg	100	9/14/2007	CAS	WATPH-HCID	
%moisture	18.2	Percent				%moisture	

Surrogate Data

Sample Number	070912049-001				
Surrogate Standard	Method	Percent Recovery	Control Limits		
hexacosane	WATPH-HCID	59.3	50-150		

Sample Number	070912049-002	Sampling Date	9/11/2007	Date/Time Received	9/12/2007 3:15 AM
Client Sample ID	B-7-2	Sampling Time		Extraction Date	9/14/07
Matrix:	Soil	Sample Location			

Parameter	Result	Units	PQL	Analysis Date	Analyst	Method	Qualifier
HCID Diesel	ND	mg/Kg	50	9/14/2007	CAS	WATPH-HCID	
HCID Gasoline	ND	mg/Kg	25	9/14/2007	CAS	WATPH-HCID	
HCID Lube Oil	ND	mg/Kg	100	9/14/2007	CAS	WATPH-HCID	
%moisture	12.7	Percent				%moisture	

Surrogate Data

Sample Number	070912049-002				
Surrogate Standard	Method	Percent Recovery	Control Limits		
hexacosane	WATPH-HCID	50.8	50-150		

Comments:

Anatek Labs, Inc.

1282 Alluras Drive • Moscow, ID 83843 • (208) 883-2839 • Fax (208) 882-9246 • email moscow@anateklabs.com
504 E Sprague Ste. D • Spokane WA 99202 • (509) 838-3999 • Fax (509) 838-4433 • email spokane@anateklabs.com

Client: LFR INC
Address: 2310 N. MOLTER RD. #101
LIBERTY LAKE, WA 99019
Attn: NICHOL PETTIS

Batch #: 070912049
Project Name: EKG - 027-30066-00

Analytical Results Report

Sample Number	070912049-003	Sampling Date	9/11/2007	Date/Time Received	9/12/2007 3:15 AM
Client Sample ID	B-9-1	Sampling Time		Extraction Date	9/17/2007
Matrix:	Soil	Sample Location			

Parameter	Result	Units	PQL	Analysis Date	Analyst	Method	Qualifier
2,4,5-T	ND	mg/Kg	0.01	9/24/2007	EMP	EPA 8151A	
2,4,5-TP (Silvex)	ND	mg/Kg	0.01	9/24/2007	EMP	EPA 8151A	
2,4-D	ND	mg/Kg	0.01	9/24/2007	EMP	EPA 8151A	
2,4-DB	ND	mg/Kg	0.01	9/24/2007	EMP	EPA 8151A	
Dacthal	ND	mg/Kg	0.01	9/24/2007	EMP	EPA 8151A	
Dalapon	ND	mg/Kg	0.01	9/24/2007	EMP	EPA 8151A	
Dicamba	ND	mg/Kg	0.01	9/24/2007	EMP	EPA 8151A	
Dichloroprop	ND	mg/Kg	0.01	9/24/2007	EMP	EPA 8151A	
Dinoseb	ND	mg/Kg	0.01	9/24/2007	EMP	EPA 8151A	
MCPA	ND	mg/Kg	0.01	9/24/2007	EMP	EPA 8151A	
Pentachlorophenol	ND	mg/Kg	0.01	9/24/2007	EMP	EPA 8151A	
Pictoram	ND	mg/Kg	0.01	9/24/2007	EMP	EPA 8151A	
%moisture	5.8	Percent				%moisture	

Surrogate Data

Sample Number	070912049-003			
Surrogate Standard		Method	Percent Recovery	Control Limits
3,5-Dichlorobenzoic Acid		EPA 8151A	69.6	35-145

Authorized Signature

Kathleen A. Latta

MCL EPA's Maximum Contaminant Level
ND Not Detected
PQL Practical Quantitation Limit

Comments:

Saturday, September 29, 2007

Page 2 of 2

Due

EKG - 027-30066-00

SAMPLER (Signature)

CHAIN of CUSTODY - ANALYSES FORM CDR 5/2003

AMERICAN ANALYTICAL SERVICES**Date: 09/19/2007****Report Number: LFR 091907.****Client: LFR****units = mg/Kg****Attn: Tony Chavez****Fax # (509) 535-7361****Phone # (509) 535-7225****Project Name:**

#	Sample		NaClO ₃
1	B-1-1		2510
2	B-2-1		2970
3	B-5-1		4570
4	B-3-1		77.1
5	B-6-1		11800
6	B-7-1		606
7	B-8-1		128
8	B-9-1		113
	Blank		<1.00
	Spike		108%
	Units		mg/Kg
	Method		300.0

AMERICAN ANALYTICAL SERVICES

Date: 09/27/2007

Report Number: LFR 092707

Client: LFR

units = mg/Kg

Attn: Tony Chavez

Fax # (509) 535-7361

Phone # (509) 535-7225

Project Name:

#	Sample		Pb	Total Cr	Total Cr
1	B-1-1		11.00	21.4	na
2	B-1-2		6.65	22.4	na
3	B-1-3		12.10	15.7	na
4	B-1-5		8.34	23.4	na
5	B-6-1		9.11	31.8	na
6	B-7-1		10.30	16.7	na
7	B-8-1		7.70	13.3	na
8	B-9-1		8.82	14.4	na
9	Soil Cuttings		6.20	11.7	na
10	Decon Water		0.08	na	0.159
	B-6-1	duplicate	13.9	24.2	na
	B-6-1	spike	68.5%	79.5%	na
	Units		mg/Kg	mg/Kg	mg/L
	Method		200.7	200.7	200.7

AMERICAN ANALYTICAL SERVICES**Date: 09/28/2007****Report Number: LFR 092807****Client: LFR****Attn: Tony Chavez****Fax # (509) 535-7361****units = mg/Kg****Phone # (509) 535-7225****Project Name:**

#	Sample	NaClO ₃
1	B-1-2	974
2	B-2-2	489
3	B-3-2	534
4	B-5-2	8055
5	B-6-2	7047
6	B-7-2	1566
7	B-8-2	2304
	Blank	<1.00
	Spike	108%
	Units	mg/Kg
	Method	300.0

AMERICAN ANALYTICAL SERVICES**Date: 10/05/2007****Report Number: LFR 100507****Client: LFR****units = mg/Kg****Attn: Tony Chavez****Fax # (509) 535-7361****Phone # (509) 535-7225****Project Name:**

#	Sample		NaClO ₃
1	B-1-3		1524
2	B-5-3		4180
3	B-8-3		1761
	Blank		<1.00
	Spike		88%
	Units		mg/Kg
	Method		300.0

AMERICAN ANALYTICAL SERVICES

Date: 10/15/2007

Report Number: LFR 101507

Client: LFR

units = mg/Kg

Attn: Tony Chavez

Fax # (509) 535-7361

Phone # (509) 535-7225

Project Name:

#	Sample		Cr VI
1	B-6-1		5.74
	B-6-1	Duplicate	5.35
	B-6-1	Spike	96.0%
	Units		mg/Kg
	Method		3500Cr B

AMERICAN ANALYTICAL SERVICES**Date: 10/15/2007****Report Number: LFR 101607****Client: LFR****units = mg/Kg****Attn: Tony Chavez****Fax # (509) 535-7361****Phone # (509) 535-7225****Project Name:**

#	Sample		Total Cr
1	B-8-2		14.8
2	B-5-2		12.9
	B-5-2	duplicate	16.4
	B-5-2	spike	83.0%
	Units		mg/Kg
	Method		200.7

AMERICAN ANALYTICAL SERVICES**Date: 10/17/2007****Report Number: LFR 101707****Client: LFR****units = mg/Kg****Attn: Tony Chavez****Fax # (509) 535-7361****Phone # (509) 535-7225****Project Name:**

#	Sample		NaClO ₃
1	B-2-3		4288
2	B-3-3		144
3	B-7-3		390
	B-7-3	duplicate	409
	B-7-3	spike	95%
	Units		mg/Kg
	Method		300.0

AMERICAN ANALYTICAL SERVICES, INC.
P.O. Box 748 * 59148 Silver Valley Road * Osburn, ID 83849

ICP
INDUCTIVELY COUPLED PLASMA-ATOMIC EMISSION SPECTROMETRY
Standard Operating Procedure

SOP NUMBER: AAS 20.2.013
SOP TITLE: ICP
Method: 200.7

VERSION: 1.0
DATE EFFECTIVE: 01/01/05
DATE RETIRED:

1.0 INTRODUCTION:

Inductively coupled plasma determines trace elements, including metals, in solution. The method is applicable to all of the elements listed in Table I. All matrices, excluding filtered groundwater samples but including groundwater, aqueous samples, TCLP and EP extracts, industrial and organic wastes, soils, sludges, sediments, and other solid wastes, require digestion prior to analysis. Use reagents that are ultra-high-purity grade or equivalent. High quality flow regulators are required for both the nebulizer argon and the plasma support gas flow. A peristaltic pump is recommended to regulate sample flow to the nebulizer. In general, pneumatic nebulizers of the concentric or cross-flow design are used. Before using this procedure to analyze samples, recommended data documenting initial demonstration of performance.

2.0 APPARATUS/EQUIPMENT MATERIALS

2.1 ICP source

- 2.1.1 High quality flow regulators are required for both the nebulizer argon and the plasma support gas.**
- 2.1.2 Peristaltic pump is recommended to regulate sample flow to the nebulizer.**
- 2.1.3 Autosampler (optional)**
- 2.1.4 Argon gas supply**
- 2.1.5 Volumetric flasks of suitable precision and accuracy.**

2.1.6 Volumetric pipets of suitable precision and accuracy.

3.0 REAGENTS:

3.1 DI water

3.2 Hydrochloric acid conc. (HCl)

3.3 Nitric acid (HNO₃)

3.4 Nitric acid (HNO₃) 1 + 1: Add 500 mL conc HNO₃ to 400 mL water and dilute to 1 liter

3.5 Stock Solutions: Prepare a series of standard metal solutions in the optimum concentration range by appropriate dilution with 1.5 mL HNO₃.

3.6 Mixed calibration standard solutions: prepare mixed calibration standards containing the concentrations needed, by combining appropriate volumes of the stock solutions in 100 mL volumetric flasks. Add 2 mL 1 + 1 HNO₃ 10 mL 1 + 1 HCl and dilute to each stock solution separately to determine possible spectral interference or the presence of impurities.

3.7 ICV-CCV (Initial calibration verification/ Continuous calibration verification): 10 ppm standard of element mixture being analyzed.

3.8 ICB-CCB (Initial calibration blank/Continuous calibration blank): Dilute 25 mL HNO₃ to 500 mL with DI water.

3.9 PEAKING ELEMENT: Mn (manganese) standard 10 ppm

3.10 Rob (Reagent Blank): Carry a reagent blank to contain the same acid types and concentrations as the sample solutions.

3.11 Quality control sample: Prepare a sample in triplicate, the 2nd sample (duplicate), the 3rd sample/w 5 mL standard mixture (spike) and carry through the entire sample preparation.

3.10 LCS: Lab Control Spike: Prepare Rgb and spike it with 5 mL standards mixture and carry through entire sample preparation.

3.11 Nebulizer cleaner: Measure 25 mL HNO₃ and 2.5 mL HBF₄ to DI water and dilute to 500 mL.

3.12 Argon: Use technical or welder's grade. If gas appears to be a source of problems, use prepurified grade.

4.0 PROCEDURE

- 4.1 Preliminary treatment of most matrices is necessary. Groundwater samples that have been prefiltered and acidified will not need acid digestion. Samples, which are not digested, must either use an internal standard or be matrix matched with the standards. Use acid digestion procedures for samples that are required.
- 4.2 Set up instrument with proper operating parameters. The instrument must become thermally stable, $\frac{1}{2}$ – 1 hr before beginning operation. Operating conditions – follow the start up instructions provided by the instrument manufacturer.
- 4.3 Peak optics:
 - 4.3.1 Select the element Mn to peak the optics.
 - 4.3.2 Place aspirator in peaking element (10 ppm Mn) for approx. 1 min.
 - 4.3.3 Peak x, y, wait for instrument to find correct position, if peaks are off center repeat x and y, wait for adjustments for final scan.
- 4.4 Calibration:
 - 4.4.1 Select elements to be standardized.
 - 4.4.2 Enter value of the standards.
 - 4.4.3 Once all values are entered, aspirate the blank, this is your first standard, enter 2 replicates, repeat this process with the remaining standards.
 - 4.4.4 After all standards have been analyzed, read calibration line. Check slope and calculations for acceptance. Once you have accepted all the standards, you are ready to run ICV, ICB or samples.
- 4.5 Update:
 - 4.5.1 When appropriate update standards instead of recalibrating them.
Aspirate the highest standard (1min) and check slope.
 - 4.5.2 Aspirate blank and check intercept.

4.6 Samples:

- 4.6.1 Aspirate samples (1min), identify sample name, and repeat for remaining samples.**
- 4.6.2 After every 10 samples a CCV and a CCB should be run. These are a control and a blank respectively. In some cases these are required at the beginning of the run and are identified as ICV and ICB.**
- 4.6.3 A duplicate is analyzed for every 10 samples, a laboratory control spike (LCS), and a reagent blank (RGB) with each group of samples, for quality assurance.**

APPENDIX C

Sodium Chlorate Analytical Method

Method for running Chlorate by 300.0

Weigh out 10 gr soil into a beaker.

Weigh out a portion for % moisture calculation

Add 100 ml of DI water to beaker of soil and sonicate for 30 minutes.
Filter and run for chloride on IC.

Take portion (50ml) of sample and add 2 ml FeSO_4 and heat to boiling.
Boil 5 minutes.

Cool and bulk back to 50 ml.
Filter and run for chloride on IC.

Multiply both results by 10 for the 10 x dilution and the % solid from the moisture calculation.

Multiply the treated sample by 2 because of the 50 ml sample.

Subtract the two results.

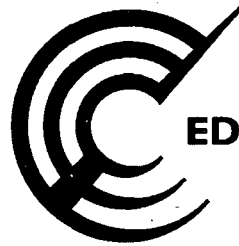
The Ferrous Sulfate has reduced the chlorate to chloride.
The difference figure is the chlorate in the sample minus the chloride already present in the sample.

This figure is then stoichiometrically adjusted for Sodium Chlorate.

All Chlorate was assumed to be Sodium Chlorate.

Method for running Chromium VI

Sample was leached in the same way as above in the sonicator. The sample was filtered and run by Colorimetric Method 8023 for water and wastewater.



EDR® Environmental
Data Resources Inc

The EDR Radius Map with GeoCheck®

**Eka
2701 Road N NE
Moses Lake, WA 98837**

Inquiry Number: 2001720.2s

August 09, 2007

The Standard in Environmental Risk Information

440 Wheelers Farms Road
Milford, Connecticut 06461

Nationwide Customer Service

Telephone: 1-800-352-0050
Fax: 1-800-231-6802
Internet: www.edrnet.com

APPENDIX D

EDR Reports

TABLE OF CONTENTS

SECTION

PAGE

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APPENDIX E

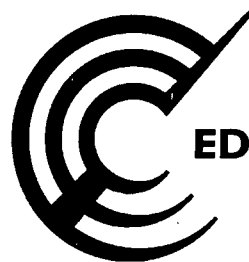
Topographic Maps

EDR Historical Topographic Map Report

**Eka
2701 Road N NE
Moses Lake, WA 98837**

Inquiry Number: 2001720.4

August 13, 2007



**EDR® Environmental
Data Resources Inc**

The Standard in Environmental Risk Information

**440 Wheelers Farms Rd
Milford, Connecticut 06461**

Nationwide Customer Service

**Telephone: 1-800-352-0050
Fax: 1-800-231-6802
Internet: www.edrnet.com**

EDR Historical Topographic Map Report

Environmental Data Resources, Inc.'s (EDR) Historical Topographic Map Report is designed to assist professionals in evaluating potential liability on a target property resulting from past activities. EDR's Historical Topographic Map Report includes a search of a collection of public and private color historical topographic maps, dating back to the early 1900s.

Thank you for your business.
Please contact EDR at 1-800-352-0050
with any questions or comments.

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APPENDIX F

Sanborn Maps

Certified Sanborn® Map Report



Sanborn® Library search results
Certification # D31E-44A3-AFA5

Eka
2701 Road N NE
Moses Lake, WA 98837

Inquiry Number 2001720.3

August 09, 2007



EDR® Environmental
Data Resources Inc

The Standard in Environmental Risk Information

440 Wheelers Farms Rd
Milford, Connecticut 06461

Nationwide Customer Service

Telephone: 1-800-352-0050
Fax: 1-800-231-6802
Internet: www.edrnet.com

Certified Sanborn® Map Report

8/09/07

Site Name:

Eka
2701 Road N NE
Moses Lake, WA 98837

Client Name:

LFR
2310 North Molter Road
Liberty Lake, WA 99019

EDR Inquiry # 2001720.3

Contact: Nichol Pettis



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